

To: Arthur Neal, Director, Program Administration
National Organic Program, USDA-AMS-TMO-NOP

From: Kurt Damm, Damm Corp, Manitowoc WI

Reference: National Organic Program, Sunset Review, 7 CFR #205.601 (Docket Number TM-04-07)
Synthetic substances allowed for use in organic crop production --

Position: We urge you to continue to allow **Humic acids – naturally occurring deposits, water and alkali extracts only.**

By definition, humic acids are “naturally occurring deposits, water and alkali extracts only.” The supplier of our humic acid substances derives its humic and fulvic acid ingredients via pure water leaching/extractions. Apparently, humic acids are listed under the heading “**Synthetic** substances allowed for use in organic crop production,” because the USDA category allows alkali extractions. Nevertheless, our supply of humic acid derivatives is a *water leached* naturally occurring product, that: 1) **is not** harmful to human health or the environment; 2) **is** necessary because it is extremely beneficial and IS NON-synthetic; and 3) **is** consistent and compatible with organic practices. This raw material is an essential component in the humic acid products presently used by organic growers. Expiration of this allowance would cause irreparable disruption of our well-established and accepted production of primary lines of products. We respectfully request the National Organic Standards Board (“NOSB”) recommend and that the Secretary of Agriculture renew humic acids’ “allowed” status, for use in organic crop production.